

1.20-MJ-11/PAS

**AFFIDAVIT IN SUPPORT OF
APPLICATION FOR CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Matthew J. Riportella, being first duly sworn, hereby depose and state as follows:

1. I make this affidavit in support of applications for a criminal complaint and arrest warrants for OLABODE SHABA ("SHABA") for wire fraud in violation of 18 U.S.C. § 1343 and money laundering in violation of 18 U.S.C. § 1956(a)(1)(B)(i).

Agent Background and Experience

2. I am a Special Agent with the FBI, and have been since 2012. I have participated in investigations relating to fraud, illegal gambling, bookmaking, extortion, kidnapping, and narcotics crimes. Many of the investigations in which I have participated were national in scope, and required me to work closely, and to share information and intelligence, with members of other law enforcement agencies.
3. As an FBI Special Agent, I have used various investigatory tools and techniques, including confidential informants, cooperating witnesses, undercover agents, physical surveillance, search warrants, telephone toll analysis, court-authorized electronic surveillance, grand jury investigations, and witness interviews. I have also participated in the execution of search warrants resulting in the seizure of ledgers and related paper work, both physical and electronic; United States currency; records of monetary transactions; and computers, cell phones, and other electronic devices used in the conduct of illegal activity.

4. I am the case agent for this investigation. I have worked closely with other FBI special agents and law enforcement personnel, including members of the United States Postal Inspection Service (USPIS), the United States Secret Service (USSS), the Providence, Rhode Island Police Department, and numerous local police departments. Accordingly, I am familiar with the facts concerning this investigation. The facts in this affidavit come from my personal observations, my training and experience, phone and bank records, and information obtained from other agents and witnesses. This case is under investigation and not all information about the scheme is currently known to law enforcement. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrants and does not set forth all of my knowledge about this matter.

Statement of Probable Cause

5. The United States is investigating a multi-faceted fraud scheme involving a number of individuals, known and unknown, who are living in in Rhode Island and other locations (collectively "the SUBJECTS"). Based on the facts set forth in this affidavit, there is probable cause to believe that violations of 18 U.S.C. § 1343 (wire fraud), and 1956(a)(1)(B)(i) (money laundering) have been committed by SHABA and others.
6. The fraud scheme under investigation takes several forms, including "romance" fraud; "grant" fraud and "online sales" fraud. The common denominator is the obtaining of funds through false pretenses and links to the SUBJECTS. In some

instances the victims are directed to send the fraud proceeds directly to the SUBJECTS and/or entities controlled by the SUBJECTS; in other instances, the victims are directed to send the fraud proceeds to other victims, who are further directed to forward the fraud proceeds to the SUBJECTS; in some instances, the victims are directed to send the fraud proceeds to recipients who have yet to be identified as additional victims or as co-conspirators.

7. To date, dozens of victims have been identified by law enforcement in locations throughout the United States. Many of the fraud victims sent money to bank accounts and addresses controlled by SHABA. Some victims were directed to send fraud proceeds to multiple locations, which include bank accounts and addresses controlled by SHABA and other SUBJECTS elsewhere.

The Subjects and His Related Entities

8. According to RI Secretary of State records, Road Boss Logistics LLC ("Road Boss") is a Rhode Island Corporation formed by SHABA in January 2019. SHABA opened PO BOX 41184 at the Corliss Street Post Office in the name of Road Boss Logistics. SHABA has a bank account for Road Boss Logistics at TD Bank which lists the address as 60 Urban Avenue, Apt 3, North Providence, RI. Shaba's TD Bank account ends in the numbers ***5813 and is referred to herein as "TD account ***5813."

Romance Fraud

9. One form of the fraud scheme is a romance fraud. In the "romance" fraud scheme, victims encounter a SUBJECT through an online interaction; sometimes through dating websites and applications such as match1.com, other times through interactive smart phone applications such as "Words with Friends." The SUBJECT provides false identity information and pretends to be romantically interested in the victim. The subjects pretend to be both male and female, heterosexual and homosexual, depending on the particular victim. SUBJECT frequently promises to meet the victim in person, with plans for a long term relationship, only to cancel on the eve of the meeting due to a fabricated emergency. As the SUBJECT builds trust with the victim over time, the SUBJECT begins asking for money from the victim, and sometimes gains access to the victim's financial accounts, credit cards, and PayPal accounts.
10. A forty-five year of female, from Maryland, hereinafter referred to as "CF" is a victim of a romance fraud scam. In March 2019, CF joined an online dating website. CF met a person who self-identified as "Steve Erickson Johansson," (hereinafter "JOHANSSON"). JOHANSSON claimed to live in New York and to be starting a cocoa company based in Peru. CF and JOHANSSON exchanged thousands of text messages over a period of months. At some point, JOHANSSON contacted CF and said things had gone wrong on his Peru project and asked her for help. JOHANSSON said he needed \$19,000 in order to pay workers in Peru which would allow his deal to go through. At first CF declined

and said that was too much money to send him, but JOHANSSON was very persistent in his request and said CF would be paid back as soon as the deal went through and he was paid. JOHANSSON even provided CF with his bank account information and log-in as a show of good faith. CF used the link sent to her by JOHANSSON in a text message, and logged into an account at the Bank of Lithuania. After this she felt more comfortable and trusted JOHANSSON so she wired him the money. CF's first wire transfer to JOHANSSON was for \$97,000 and she wired the funds to the account JOHANSSON gave her, which he said was a business account. The additional funds above the \$19,000 initially requested were supposedly for taxes that JOHANSSON said were supposed to be paid by an unknown third party that was "screwing" him. JOHANSSON reiterated he could not repay CF until the shipment went out and he got paid. JOHANSSON continually told CF that with the more money she sent him, it increased the odds of his transaction completing and her getting paid back, so she kept sending JOHANSSON money. CF sent between \$500,000 and \$750,000 to various entities at JOHANSSON's direction. CF stated that one of the entities she was directed to send money to was ROAD BOSS LOGISTICS LLC, which is SHABA's entity. According to CF, she obtained the money by liquidating her assets and taking out loans.

11. According to bank records obtained from Wells Fargo and TD Bank, between April and May 2019, CF sent \$115,000 in wire transfers to SHABA's bank account, TD account ***5813.
12. On April 25, 2019, CF wired \$55,000 to SHABA's TD account ***5813.
13. According to bank records, after the wire transfer, within a few days the funds were immediately depleted from the SHABA's TD account ***5813 account via withdrawals, miscellaneous debits, and checks written to SHABA's personal account. For example:
 - a. On April 26, 2019, SHABA wrote check #127 to himself for \$5,000 and deposited it into his personal account;
 - b. On April 26, 2019, SHABA wrote check #128 to himself for \$5,000 and deposited it into his personal account;
 - c. On April 29, 2019 SHABA wrote check #130 to himself for \$5,000 and deposited it into his personal account;
 - d. On April 29, 2019, SHABA wrote check #131 to himself for \$5,000 and deposited it into his personal account;
 - e. On April 29, 2019, SHABA wrote check #132 to himself for \$24,000 and deposited it into his personal account.
14. On May 2, 2019, CF wired an additional \$60,000 to SHABA's Road Boss TD account ***5813 at JOHANNSON's direction.

15. According to bank records, after the wire transfer, within a few days the funds were immediately depleted from the SHABA's TD account ***5813 account via withdrawals, miscellaneous debits, and checks written to SHABA's personal account at Chase Bank. For example:

- a. On May 3, 2019, SHABA wrote check #138 to himself for \$20,000 and deposited it into his personal account;
- b. On May 3, 2019, SHABA wrote check #140 to himself for \$3,000 and deposited it into his personal account;
- c. On May 6, 2019, SHABA wrote check #141 to himself for \$36,000 and deposited it into his personal account;

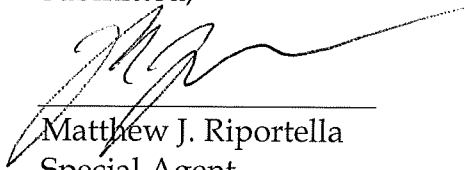
16. After the funds were in SHABA's personal account, SHABA wired the money overseas to bank accounts in Nigeria. For example:

- a. On April 29, 2019, SHABA wired \$13,000 to a bank account in Nigeria
- b. On April 30, 2019, SHABA wired \$18,970 to a bank account in Nigeria
- c. On May 6, 2019, SHABA wired \$20,000 to a bank account in Nigeria
- d. On May 14, 2019, SHABA wired \$14,000 to a bank account in Nigeria
- e. On May 14, 2019, SHABA wired \$4,000 to a bank account in Nigeria
- f. On May 15, 2019, SHABA wired \$17,000 to a bank account in Nigeria

17. Based on my training and experience and the facts known to me in this investigation, I do not believe "JOHANSSON" is a real person, but rather a fictitious persona used by SHABA or other participants in the fraud to defraud of

the scheme. I further believe CF's wire transfers into SHABA's account represent proceeds of wire fraud, and that SHABA's rapid depletion of the funds are indicative of money laundering transactions designed to conceal the nature, source, and location of the fraud proceeds.

Respectfully
submitted,



Matthew J. Riportella
Special Agent
Federal Bureau of
Investigation
Subscribed and sworn to before me on January 28, 2020

HON. PATRICIA A. SULLIVAN
UNITED STATES MAGISTRATE JUDGE